

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Inmates of the Northumberland	:	
County Prison, through Scott Collins,	:	
<i>et al.</i> ,	:	
Plaintiffs	:	CIVIL NO. 4:08-CV-00345
	:	
	:	JUDGE JOHN E. JONES, III
v.	:	
	:	
Ralph M. Reish, in his official	:	COMPLAINT FILED: 2/25/08
capacity as Warden of	:	
Northumberland County Prison, <i>et</i>	:	
<i>al.</i> ,	:	
Defendants	:	

**CORRECTED JOINT MOTION SEEKING APPROVAL  
OF A CLASS ACTION SETTLEMENT**

This Section 1983 class action was brought on behalf of Northumberland County Prison Inmates to enjoin an array of conditions and practices which were allegedly violating the inmates’ constitutional rights. The Defendants throughout the litigation have denied the allegations. Following certification of a Rule 23 (b)(2) global and (b)(2) subclasses and the filing and briefing of Defendants’ Motion for Summary Judgment, the parties entered into adversarial settlement negotiations within the framework of the Middle District’s Mediation Program

under the immediate supervision of Attorney Joseph Barrett, the Program's Director. Those efforts have resulted in the execution of a comprehensive settlement agreement between the parties whose terms the parties believe are fair, reasonable, and adequate within the meaning of Rule 23 and, thereby, warrant Court approval.

In conjunction with this Motion, the proposed settlement agreement is attached hereto as Exhibit "1". A notice to the Class of the proposed settlement (informing them of their right to submit objections to the settlement; the procedure for doing so; and the availability of copies of the agreement in each of the Prison's housing units) is attached as Exhibit "B" to the Settlement Agreement (Exhibit "1").

The sole purpose of filing the Corrected Joint Motion Seeking Approval of a Class Action Settlement is to attach the within revised settlement agreement (Exhibit "1"), which has been approved by all counsel.

WHEREFORE, the parties respectfully request that the proposed settlement agreement be approved by the Court, after it considers the terms of the agreement and any objections interposed to the agreement and conducts whatever proceedings the Court feels are necessary,

Respectfully submitted,

Pennsylvania Institution Law Project

Date: February 18, 2011

By: /s/ Jennifer Tobin

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Date: February 18, 2011

By: /s/ Jere Krakoff

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Date: February 18, 2011

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**CERTIFICATE OF SERVICE**

I, Cathleen A. Kohr do hereby certify that on this 18<sup>th</sup> day of February, 2011, I served a true and correct copy of the foregoing Corrected Joint Motion Seeking Approval of a Class Action Settlement, via U.S. Middle District Court's Electronic Case Filing System, addressed as follows:

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*/s/ Cathleen A. Kohr*  
Cathleen A. Kohr, Senior Paralegal

*This document has also been electronically filed and is available for viewing and downloading from the ECF system.*